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15 David Joseph Robinson

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 FABIAN JESUS BROOKS ARIAS,) Case No. 2:21-cv-00644-GMN-DJA
19 Plaintiff,)
20 vs.)
21 DAVID JOSEPH ROBINSON, an) STIPULATION AND ORDER
22 individual; DOES I through XV, and ROE) REGARDING PENDING
23 Corporations I through X, inclusive.,) DISCOVERY
24 Defendant.)
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26 Plaintiff, FABIAN JESUS BROOKS ARIAS, and Defendant, DAVID JOSEPH
27 ROBINSON (collectively, the “Parties”) by and through their respective counsel,
28 hereby submit this Stipulation and Order Regarding Pending Discovery (hereinafter,
“Stipulation and Order”), pursuant to LR 26-6 and LR IA 1-3(f).

29 This Stipulation and Order shall not affect the Dispositive Motion Deadline
30 presently set for April 8, 2022. (See, Joint Discovery Plan and Proposed Scheduling
31 Order, ECF 14), on file and referenced herein). Further, this Stipulation and Order
32 shall not affect the Pretrial Order deadline of May 8, 2022. (See *Id.*).

1 The Parties met and conferred in good faith pursuant to LR IA 1-3(f) and agreed
2 to the following Stipulation and Order with respect to pending discovery requested by
3 Defendant in this matter. Due to scheduling conflicts, the unavailability of treating
4 physician/expert witnesses, and depositions of out-of-state witnesses, this Stipulation
5 and Order is necessary to allow for their testimony outside the close of discovery.

6 As such, the Parties have agreed to allow the depositions of the following
7 person(s) to proceed outside the close of discovery and prior to the Dispositive Motion
8 Deadline of April 8, 2022.

- 9 1. Rand Kroessin;
10 2. David Conners;
11 3. Dr. Ong;

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1 4. Dr. Garber.

2 **IT IS SO STIPULATED.**

3 DATED 18th day of February 2022.

DATED 18th day of June 2022.

4 **GINA CORENA & ASSOCIATES**

**BREMER WHYTE BROWN &
O'MEARA LLP**

6 /s/Betsy C. Jefferis, Esq._

/s/ Ty M. Maynarich, Esq._

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11 Attorneys for Plaintiff

12 Attorneys for Defendant

13 **IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE

18 **DATED:** _____ February 22, 2022